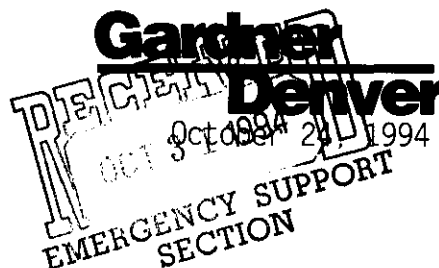


Gardner Denver Machinery Inc.  
P.O. Box 4024  
Quincy, IL 62305-4024

49297



Linda Beasley, Enforcement Specialist  
U.S.E.P.A. - Region V (HSE-5J)  
Emergency Support Section  
77 West Jackson Boulevard  
Chicago, IL. 60604

RE: HSE-5J/EERB - Conservation Chemical Site, Gary, IN.  
Gardner Denver's Response to General Notice

Dear Ms. Beasley:

On behalf of Gardner Denver Machinery Inc. ("Gardner Denver"), I submit this response to EPA's September 28, 1994 letter addressed to "Cooper Industries, Inc. (for Gardner Denver Co.)" regarding a General Notice of Potential Liability at the Conservation Chemical Company of Illinois Inc. ("CCCI") Site in Gary, Indiana ("General Notice"). I received the General Notice on October 11, 1994. Cynthia Kawakami of the Office of Regional Counsel has confirmed that a response on or before October 31, 1994 will be considered timely.

Gardner Denver does not admit any liability at the CCCI site. However, in response to EPA's General Notice, Gardner Denver is willing to cooperate with EPA toward settlement of its potential liability. At this time, we have no information concerning the extent or type of contamination, the possible remedy, or the factors that may be driving a remedial action at the site. We likewise have no information about the costs incurred or to be incurred by EPA at this site. Therefore, Gardner Denver is not in a position to make a good faith offer of reimbursement monies or to volunteer to perform or finance response activities at this time.

We have submitted a Freedom of Information Act ("FOIA") request to Region V, which is pending, in order to better evaluate the extent of the contamination and Gardner Denver's possible involvement at the site. Based on our review of the information supplied as an attachment to the General Notice letter, EPA's records currently indicate that Gardner Denver generated 4 barrels, or 220 gallons, of hazardous waste at the site. We have no independent records that would confirm or deny EPA's calculation. However, based on EPA's own calculations of our minimal volumetric contribution, we believe that Gardner Denver qualifies for treatment as a De Minimis party at the site under CERCLA Sec. 122(g).

1800 Gardner Expressway  
Quincy, IL 62301  
(217) 222-5400  
FAX: 217-223-5897

Gardner Denver® Joy® Compressors Sutorbilt® DuroFlow®

Page 2 of 2

Any waste we may have contributed to the site would be minimal in volume and in toxicity as compared to that sent by other generators. We therefore request that EPA consider settling with Gardner Denver as a De Minimis party.


Gardner Denver is willing to cooperate with EPA and to negotiate a resolution of its potential liability at the site, and we request that EPA consider us as a De Minimis generator for settlement purposes.

Gardner Denver is no longer a division of Cooper Industries, which I understand has received the same General Notice letter. Please direct all future correspondence concerning Gardner Denver to my attention at:

L. Willer, Environmental Manager  
Gardner Denver Machinery Inc.  
P. O. Box 4024  
Quincy, IL. 62305-4024

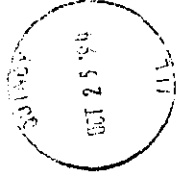
Telephone 217/222-5400 Extension 502  
FAX 217/228-8249

Very truly yours,



L. Willer

Gardner Denver Machinery Inc.  
P.O. Box 4024  
Quincy, IL 62305-4024



Linda Beasley, Enforcement Specialist  
U.S.E.P.A. - Region V (HSE-5J)  
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